

Ladies and Gentlemen of the Commission:

There isn't much more I can say about this petition, other than what has already been said by previous comments to this filing. However, several points came to me as I was reading the filing and related comments that I feel should bring forth.

1) If Dr. Trahos truly believes that the Commission's rules regarding using PMR-446 type radios in the US are unenforceable, why isn't he, in the same petition, attempting to allow ALL personal mobile radios (Japan's 425 MHz & 925 MHz personal radios, etc.) into amateur bands as well? What is it about the PMR-446 handheld radios that Dr. Trahos finds so lucrative that he feels the Commission should allow those into the country, to the exclusion of others?

2) Once this rulemaking is put into effect, what is going to stop mass illegal importation of these radios into the country? Dr. Trahos is simply trying to "punch another hole" into an amateur band for unlicensed and unregulated communications. The last time I checked, FRS radios were about \$25/pair at my local Wal-Mart, and it wasn't illegal for visitors to this country to buy them.

3) I don't know if Dr. Trahos has visited Los Angeles, but the UHF amateur band is HEAVILY UTILIZED in this section of the country, and the reservation of even 100 kHz of the center of the UHF "repeater band" would find these PMR-446 type radios subject to severe interference from hilltop-based repeaters, as well as interference to these same repeaters, and existing simplex communications on 446.000 MHz. And no, there isn't room to move the repeaters out.

4) I believe that the Commission's time would be better spent discussing and guiding telecommunications issues on a national scope, rather than trying to accomodate other country's unlicensed radio services within the US. The FCC has created an unlicensed radio service. It's called FRS. Let visitors to our country use what is available to them here, instead of bending over backwards and causing problems for many, to accomodate the few.

I urge the Commission to DENY this petition without delay.

Respectfully submitted,

Carl Swanson